

**UNITED STATES OF AMERICA  
BEFORE THE CONSUMER FINANCIAL PROTECTION BUREAU**

IN THE MATTER OF ENOVA  
INTERNATIONAL, INC.

**REQUEST FOR CONFIDENTIAL TREATMENT**

Pursuant to 12 C.F.R. § 1080.6(g), Petitioner Enova International, Inc. (“Enova”) hereby requests that portions of the enclosed Petition to Modify the Civil Investigative Demand Served on Enova International, Inc. (“Petition”) and the Declaration attached to the Petition be withheld from public disclosure for good cause as set forth below.

Under the Bureau’s regulations, petitions to modify or set aside a CID and the Director’s orders in response to those petitions “are part of the public records of the Bureau unless the Bureau determines otherwise for good cause shown.” 12 C.F.R. § 1080.6(g). However, the Bureau may determine that there is good cause for confidential treatment of all or a portion of a petition to modify or set aside a CID. In making that determination, the Bureau generally looks to the standards for withholding material from public disclosure established by the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552. *See* CFPB, Decision on Request for Confidential Treatment of Joint Petition by Great Plains Lending, LLC, Moviloans, LLC, and Plain Green, LLC (Sept. 12, 2013).

The Petition constitutes investigatory records obtained by the Bureau in connection with a potential law enforcement proceeding, which are exempt from disclosure. *See* Exemption 7(A) of FOIA, 5 U.S.C. § 552(b)(7)(A).

In addition, the Petition contains references to proprietary business information, trade secrets, and/or other confidential commercial information concerning Enova and its affiliates that have not been disclosed to the public. These materials are also protected from disclosure pursuant to Exemption 4 of FOIA, 5 U.S.C. § 552(b)(4), and will continue to remain exempt even after the conclusion of your inquiry. *See Critical Mass Energy Project v. Nuclear Regulatory Comm'n*, 975 F.2d 871 (D.C. Cir. 1992).

Finally, the Petition includes materials that are contained in or related to an examination, operating, or condition report prepared by, or for the use of the Bureau, and such records are exempt from mandatory disclosure by Exemption 8 of FOIA, 5 U.S.C. § 552(b)(8). *See, e.g., Gregory v. FDIC*, 631 F.2d 896, 898 (D.C. Cir. 1980), quoting *Consumers Union of United States, Inc. v. Heimann*, 589 F.2d 531, 533 (D.C. Cir. 1978).

Redacted copies of the Petition and Declaration are enclosed.

Dated: June 14, 2021

Respectfully submitted,

/s/ Sabrina Rose-Smith  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 14th day of June 2021, pursuant to 12 C.F.R. 1080.6(e), I caused the foregoing Request for Confidential Treatment to be served via email upon the Executive Secretary of the Bureau and the Assistant Director for the Office of Enforcement.

Dated: June 14, 2021

/s/ Levi W. Swank  
Levi W. Swank